

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

STIPULATION TO AMEND COMPLAINT

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs DENISE O'NEILL and GERALD O'NEILL and Defendant C.R. Bard, Inc., through their undersigned counsel, that Plaintiffs be allowed to amend their Complaint to include a claim for loss of consortium on behalf of GERALD O'NEILL in the above-captioned action.

Dated this 16th day of March, 2016

Respectfully submitted,

/s/ Matthew R. Lopez
Ramon Rossi Lopez
Matthew Ramon Lopez
LOPEZ MC HUGH, LLP
100 Bayview Circle, Suite 5600
Newport Beach, CA 92660
Telephone: (949) 737-1501
Facsimile: (949) 737-1504

Attorneys for Plaintiff

/s/ Richard B. North
Richard B. North
Matthew Lerner
Nelson Mullins Riley & Scarborough, LLP

201 17th Street, NW, Suite 1700
Atlantic Station, Atlanta, GA 30363

Attorneys for Defendant C.R. Bard, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, this 16th day of March, 2016, I have electronically filed a copy of the above and foregoing with Clerk of the Court using the ECF system, which sent notification of such filing to counsel of record.

/s/ Matthew R. Lopez